

## **REMARKS**

The present invention relates to a process for producing resins that can be prepared, stored, treated and transported as a dispersion or solution containing high solids concentrations without product deterioration from polymer crosslinking, such as gelation problems.

The present response to the outstanding Office Action dated October 19, 2005 is offered to satisfy the requirements of 37 CFR § 1.111.

By the present amendment and response, claims 1 and 36 have been amended and claim 14 has been cancelled. Claims 1-13, 15-29 and 31-39 are pending in the present application. Reconsideration and allowance of pending claims 1-13, 15-29 and 31-39 in view of the following remarks is respectfully requested.

### **Rejection Under 35 U.S.C. §112, First paragraph.**

The Office Action rejected claims 1-21 and 35-38 under 35 U.S.C. §112, first paragraph, as based on a disclosure which is not enabling.

The Office Action states that, "Claims 1-21 and 35-38 encompass a treatment process that includes treating composition containing a wet strength polyamine-epihalohydrin resin comprising a solids content to at least 15 wt% with an enzymatic agent to inhibit, reduce or remove a CPD-forming species. The final amount of CPD-forming species remaining in the composition after the enzyme treatment is defined in term of the 'ACID TEST'. That is, the treated composition when stored for 24 hours at 50°C, and a pH of about 1.0 releases less than about 250 ppm dry basis of CPD."

The Office Action discusses the Examples contained in the instant specification and summarized this discussion by stating that "...only Examples 3, 24, and 25 are drawn to treatment methods that treat a starting composition with a solids content of at least 15 wt% wherein the treatment method includes the claimed enzyme treatment and

establishes that the treated composition 'when stored for 24 hours at 50°C, and a pH of about 1.0 releases less than about 250 ppm dry basis of CPD'." The Office Action additionally states that "... the biodehalogenation step is critical to the invention since each of these examples also included a biodehalogenation step as part of the treatment process that resulted in a treated composition 'when stored for 24 hours at 50°C, and a pH of about 1.0 releases less than about 250 ppm CPD'".

Applicants respectfully submit that, while the Examples 3, 24, and 25 discussed by in the Office Action do utilize the biodehalogenation step as a means to reduce the amount of CPD present in the resin samples recited therein, the specification discloses additional treatments that may be used to reduce or remove the CPD-forming species contained in the resins and respectfully direct the Examiner's attention to the passage beginning on page 31, line 20 and continuing on to page 32 of the specification, as filed. In this passage, applicants disclosed the use of biodehalogenation as well as alternative ways for removing the CPD present in the samples by treating resin "with a base ion exchange column, such as disclosed in U.S. Pat. No. 5,516,885 and WO 92/22601; with carbon adsorption, such as disclosed in WO 93/21384; membrane separation, e.g., ultrafiltration; extraction, e.g., ethyl acetate, such as disclosed in U.S. Statutory Invention Registration H1613;" (page 32, lines 4-8) as well as referencing "any combination of CPD-forming species reduction or removal as disclosed in the above-noted U.S. patent application Ser. Nos. 09/592,681, 09/363,224, and 09/330,200, each of which is incorporated by reference in its entirety, can be utilized with the enzymatic treatment for reduction and/or removal of CPD-forming species." (Page 32, lines 11-15).

In the Office Action mailed on October 19, 2005, the Examiner does not question the fact "... that other means for reducing the amount of CPD present in the resin can be used". Applicants respectfully submit, that since the above-mentioned patents, patent applications and statutory invention registration have been properly incorporated by

reference in their entirety in the specification, the assertion that biodehalogenation step is critical to the invention as well as the application only enables the use of biodehalogenation is incorrect and unduly narrows the scope of the applicants invention.

Since as previously mentioned, the present application contains disclosure regarding alternative ways for removing the CPD present in the resin samples and the Examiner has stated that "... that other means for reducing the amount of CPD present in the resin can be used", it is inappropriate to require the applicants to limit their invention to contain a biodehalogenation step since the specification clearly enables a broader way for removing CPD present in the resin.

In requiring the recitation of the biodehalogenation step into claim 1, the Examiner states that "The instant specification stresses that when working with resin concentrations greater than 15% the results are unexpected when using enzymes (See page 9, lines 16-29 and page 40, line 27, to page 41, line 6, of the instant specification)." In support of this position, the Examiner points to the fact that the instant specification includes 114 pages and 38 Examples, with only a few of the Examples containing the concentration of resin recited in the claims and had been subjected to the "ACID TEST". Each of the cited Examples also included a biodehalogenation step. From this, the Examiner concludes that "...the combination of the esterase active enzyme agent and biodehalogenation are critical with respect to obtaining a product that is required of instant claim 1. While one of ordinary skill in the art may recognize that other CPD removing processes exist, in view of the unpredictability in the art, undue experimentation would be required for one of ordinary skill in the art to determine which if any of the other known treatment steps would provide the product required of claim 1." (Emphasis added.)

Applicants respectfully disagree with the Examiner's conclusion regarding the unpredictability of the art or whether undue experimentation would be required by one of ordinary skill in the art to produce the product required of claim 1.

Referring to the specification, it is clear from the passage referenced by the Examiner found on page 9 relates to the "enzymatic agent" which reduces or removes the CPD-forming species from the polyamine-epichlorohydrin resins. This passage does not discuss the unpredictability of the removal of available CPD species by biodehalogenation or the other such removal means mentioned in the specification.

Referring to the passage beginning on page 40, the specification does disclose an unexpected finding regarding whether biodehalogenation could be accomplished at higher solids. However this statement should not be viewed as limiting the scope of the claims to those situations where the treatment of the resin by the enzymatic agent and the biodehalogenation of the resin both must be performed. This passage relates to the concentration at which biodehalogenation is performed. The present claims are silent as to the concentration of the biodehalogenation step, if performed.

In reaching his conclusion regarding the unpredictability in the art, the Examiner notes the fact that applicants have provided a specification 114 pages long which contains 38 examples. The Examiner notes that only a few examples provide a resin of at least 15% concentration that is treated with an enzymatic agent, and is subsequently subjected to the "ACID TEST". Since the identified examples all also disclose the use of biodehalogenation, the Examiner concludes that "...the combination of the esterase active enzymes and biodehalogenation are critical with respect to obtaining the product that is required of claim 1."

Applicants respectfully disagree with the conclusion arrived by the Examiner.

While it is true that Examples 3, 24 and 25 recite both a starting composition of at least 15 wt % and confirmation using the "ACID TEST", it is not true the other examples

presented in the specification may be considered as evidence of the unpredictability in the art. It is noted that among the items listed as "Examples" presented were items teaching the manufacture of resins (Example 1), the composition of paper containing resins (Example 5), the adhesion generated by treated resins (Examples 32 and 34). These Examples are surely should not be construed as evidence of the unpredictability in the art.

Examples 4, 20, 21, and 22, recite treatment of the resin at concentrations less than 15 wt%. Therefore these experiments cannot be properly construed as examples of the invention, as now claimed. However, they also cannot be construed as evidence of the unpredictability in the art since the concentration of the resin to be treated was a starting condition of the experiment, and not a result of a treatment process. It is the starting conditions and not the results of these experiments which preclude one from considering these experiments as examples of the invention. Applicants respectfully assert that there is no perceived "unpredictability" associated with these experiments.

Examples 6-19, 23 and 31 recite treatment of the resin at the high concentration required by the claim, but these resins were not confirmed as the treated composition through the use of the "ACID TEST". Examples 6-19 were treated with the enzymatic agent and the resultant treated resin's viscosity was measured over time. Applicants respectfully submit that these resins exhibited degree of viscosity stabilization and therefore cannot be considered as evidence of "unpredictability". Example 23, demonstrates the bacterial growth on a creping aid resin. This resin was also tested for EPI residuals using a GC analytical method. This also cannot be considered as evidence of "unpredictability". Example 31 demonstrates the effectiveness of the enzymatic agent on polymer-bound chlorohydrin species. While not testing the treated resin with the "ACID TEST", this example does demonstrate the amount of CPD

released through the use of the enzymatic agent. This also cannot be considered as evidence of "unpredictability".

Applicants respectfully submit that the grounds set forth in the Office Action in its rejection of claims 1-21 and 35-38 under 35 U.S.C. §112, first paragraph, as based on a disclosure which is not enabling do not provide a reasonable explanation as to why the scope of protection provided by the claims are not adequately enabled by the description of the invention provided in the application. Applicants have provided evidence of the enablement of the invention. The fact that every item labeled as an "Example" contained in the application does not establish every limitation of the invention is more of a failure of the applicants to properly categorize and label their disclosures rather than a failure of the applicants to enable the invention. This failure of labeling, along with an extensive specification cannot reasonably be viewed as evidence of "unpredictability".

Applicants respectfully assert that the rejection of claims 1-21 and 35-38 under 35 U.S.C. §112, first paragraph, as based on a disclosure which is not enabling has been traversed. Applicants respectfully request that the rejection of claims 1-21 and 35-38 under 35 U.S.C. §112, first paragraph be withdrawn and request allowance of claims 1-13, 15-29 and 31-39.

**Rejections Under 35 U.S.C. §112, Second paragraph.**

The Office Action rejected claims 1-29 and 31-35 and 39 under 35 U.S.C. §112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. In particular, the Office Action states that "In claim 1, reference to 'the compositions containing a polyamine-epihalohydrin creping resin' lacks antecedent basis." The Office Action additionally states that claims 2-29, 31-35 and 39 are indefinite based on their dependency from claim 1.

Applicants have amended claim 1 to remove the reference to the term “creping”. Applicants respectfully submit that this amendment removes the basis for the 35 USC 112, second paragraph rejection of claim 1 presented in the Office Action and that all claims dependent upon claim 1 should also be free of this basis of rejection. Applicants respectfully submit that the pending claims are now in condition for allowance and respectfully request the allowance of these claims in the next Office Action.

**Rejections Under 35 U.S.C. § 103 (a)**

The Office Action rejected claims 1-12, 14-16, 18-25 and 35-37 under 35 U.S.C. 103(a) as being unpatenable over Riehle et al. (US 6,554,961 or US2003/0205345) in view of Bull et al. (US 5,470,742).

In particular, the Office Action states that “The reference of Riehle (sic.) et al. discloses a process for rendering a polyamine-epihalohydrin resin storage stable, that includes treating a composition containing a wet strength polyamine-epihalohydrin resin, the composition comprising a solids content of at least 15 wt% (21%, see Example 75) and including CPD-forming species, with at least one enzymatic agent under conditions to at least one of inhibit, reduce, and remove the CPK-forming species.” The Office Action also states that “The reference of Riehle (sic.) et al., discloses employing resins formed in a reaction having a molar ratio from about 0.50 to about 1.8....” The Office Action also states that “The claim language ‘less than about 0.50’ would include ‘0.50’ and that claim 1 differs by reciting that the concentration of the resin is at least 15% when contacted with the enzymatic agent.” In arriving at its rejection of the Office Action combines Riehle et al. with Bull et al. by stating that, “The reference of Bull et al. discloses that when treating a composition that includes CPD-forming species it is known to treat a composition that includes a solids content of up to 50 wt% with an enzymatic agent (See column 6, lines 43-48).”

Applicants respectfully traverse the rejection of claims 1-13, 15-29 and 31-39 under 35 U.S.C. 103(a) as being unpatentable over Riehle et al. (US 6,554,961 or US2003/0205345) in view of Bull et al. (US 5,470,742) for the reason that it would not be obvious to a person of ordinary skill in the art to combine the teachings of Riehle et al. with Bull et al. and that even if such a combination were to be made, the resultant combination would not equate to the applicants' invention, as claimed.

In applicants' response dated July 26, 2005 to the previous Office Action, applicants amended the claims so that the claims clearly recited that "the solids content of the composition...is at least 15 wt% when treated with the at least one enzymatic agent". Additionally in applicants' July 26, 2005 response, the claims were amended so that the amended claims clearly recite that a "...molar ratio of epihalohydrin to secondary amine group of less than 0.50...."

In the present response, applicants have amended claims 1 and 36 to further define the enzymatic agent as being "...selected from the group consisting of an esterase, a lipase, a protease or a combination thereof."

As in applicants' previous response, applicants respectfully direct the Examiner's attention to the following passage in Riehle et al. where "In Example 75 of US 6554961, the UNTREATED resin has a solids content of 21% however BEFORE treatment the resin is diluted (see col. 89, lines 51-55)." Applicants respectfully submit that the treatment of a resin with a solids content of above 15%, which is claimed in the present invention, is not taught or suggested in Riehle US 6554961."

Additionally, applicants respectfully submit that in their previous response, the claims had been amended to remove the term "about" after the term "less than" so that the claims clearly recite molar ratios below 0.50. The statement contained on page 8 of the present Office Action does not reflect the fact that the claims as previously presented



do not contain the term "about" and as such the "tolerance" discussed in the cited case would not be relevant in the present situation.

So, it is clear that Riehle et al. neither suggests the treatment of compositions with enzymatic agents at concentrations above 15 wt% nor resins with a molar ratio of less than 0.50. Bull et al. is presented in the Office Action as teaching the treatment of compositions with solids content of up to 50 wt% with an enzymatic agent (Column 6, lines 43-48.)

Applicants respectfully submit that the passage found at Column 6, lines 43 -48 in Bull et al. does not teach the treatment of polyamine-epihalohydrin resins at high concentrations with an enzymatic agent, but rather teaches "...the nitrogen-containing cationic polymer is preferably present in an amount of from about 1 to 50 weight percent...." This passage simply relates to the amount of nitrogen-containing cationic polymer generally present in the aqueous composition used to strengthen paper. This passage does not teach the treatment of this composition at high concentrations (e.g. 15 wt% or above) with enzymatic agents. In fact, when Bull et al. does provide a verifiable concentration of the resins treated by its bacterial cultures, it is listed as 11.75 % w/v active solids solution (Example 7, column 16, line 13) and 12.5 % w/w (Example 8, column 16, line 58.) This is clearly not the high concentrations that are claimed by the applicants. A person of ordinary skill in the art would not be motivated to increase the concentration of the resin to be reacted with the enzymatic agent as taught by Riehle et al. in view of the teachings of Bull et al. since Bull et al. actually teaches the use of lower concentrations of resins (12.5 % w/w) than is taught in Riehle et al.

Additionally, Bull et al teaches "the reaction of an enzyme with the nitrogen-free organohalogen compound whereby the nitrogen-free organohalogen is dehalogenated." (Column 7, lines 64-66). The enzyme of use in Bull et al. is referred to as a "dehalogenase". (Column 7, line 67.)

Applicants have amended their claims to recite the enzymatic agents as being selected from the group consisting of an esterase, a lipase, a protease or a combination thereof. This clearly distinguishes the enzymatic agents of use in the present invention from the dehalogenase taught in Bull et al.

In view of the above discussion and in light of the amendments made to the present claims, applicants respectfully submit that the rejection of claims 1-13, 15-29 and 31-39 under 35 U.S.C. 103(a) as being unpatentable over Riehle et al. (US 6,554,961 or US2003/0205345) in view of Bull et al. (US 5,470,742) has been traversed. Applicants respectfully request withdrawal of the rejection of claims 1-13, 15-29 and 31-39 under 35 U.S.C. 103(a) over Riehle et al. in view of Bull et al. and request allowance of said claims.

The Office Action rejected claims 1-13, 19-21 and 34-37 under 35 U.S.C. §103(a) as being obvious over Bull et al. (US 5,470,742) in view of Miller et al. (US 5,171,795).

The Office Action states that “[W]ith respect to claims 1 and 2, the reference of Bull et al. discloses a method of rendering a polyamine-epihalohydrin resin storage stable. The method discloses treating a composition containing a wet strength polyamine-epihalohydrin resin including a solids content of at least 15 wt%. The composition is treated with at least one enzymatic agent under conditions to at least one of inhibit, reduce and remove CPD-forming species.”

Applicants respectfully traverse the rejection of rejected claims 1-13, 19-21 and 34-37 under 35 U.S.C. §103(a) as being obvious over Bull et al. in view of Miller et al. for the reason that if a person having ordinary skill in the art was to make the combination of Bull et al. with Miller et al., the combination would not result in the instant invention as claimed.

The Office Action states that "...Bull et al. discloses a method of rendering a polyamine-epihalohydrin resin storage stable. The method discloses treating a composition containing a wet strength polyamine-epihalohydrin resin including a solids content of at least 15 wt% (See column 6, lines 43-48)."

As previously stated, applicants respectfully disagree with the Office Action as to the teaching of Bull et al. A review of the passage referenced in the Office Action makes it clear that the concentrations referred to in the passage relate to the weight percent of the nitrogen-containing cationic polymer preferably present in the compositions recited therein, but not the concentrations at which those resins may be treated with enzymatic agents to remove organohalogen-containing compounds contained in those resins. The passage referenced is clearly not directed to disclosing the method for treating compositions. In passages where Bull et al. discusses the treatment of compositions for the removal of contaminants, the concentration of the nitrogen-free organohalogen-containing compound taught therein is at most 12.5% solids on a w/w basis. (Please see column 9, lines 5-11.) In the examples provided in Bull et al., examples 5 and 8 disclose the biocatalytic dehalogenation of a polyamide wet strength resin having 12.5% w/w active solids while Example 7 discloses the treatment of 11.75% w/v resin. Bull et al. does not disclose treating strength resins at the higher concentrations as claimed by the applicants or suggest the desirability of modifying the concentrations recited in its specification to achieve treatment of the compositions at the higher concentrations claimed by applicants.

Additionally, as stated in applicants' response to the rejection of claims 1-12, 14-16, 18-25 and 35-37 under 35 U.S.C. 103(a) as being unpatentable over Riehle et al. (US 6,554,961 or US2003/0205345) in view of Bull et al. (US 5,470,742), applicants have amended their claims to recite the enzymatic agents as being selected from the group consisting of an esterase, a lipase, a protease or a combination thereof. This

clearly distinguishes the enzymatic agents of use in the present invention from the dehalogenase taught in Bull et al.

Miller et al. relates to a process for the synthesis of improved, water soluble polyaminopolyamide-epichlorohydrin resins. In the process disclosed therein, a broad range of equivalents of epichlorohydrin to secondary amine content of a starting polyaminopolyamide resin is recited. This broad range is from 0.05 to 1.5 molar equivalents of epichlorohydrin to secondary amine which encompasses more of a range of epichlorohydrin to secondary amine which is above the ratio contained in the present claims than which is within the range. In fact, the preferred recited ratio of epichlorohydrin to secondary amine of Miller et al., "about 0.5 to 1.1 molar equivalents" (Column 4, line 39), is above the ratio contained in the instant claims. A person of ordinary skill would have no motivation to choose a molar ratio of "less than 0.5" in view of the teaching of Miller et al. since Miller et al. teaches levels of molar ratios from an order of magnitude below the upper level taught by applicants to a level of three times above the highest level taught by the applicants in its broadest range and teaches molar ratios above the level claimed by the applicants in its preferred range.

Additionally, applicants respectfully wish to clarify one aspect of regarding the teachings of Bull et al. In particular, applicants respectfully assert that Bull et al., while a useful process for performing biodehalogenation on resin compositions which are being treated by the process of the present invention, do not result in a polyamine-epihalohydrin resin which is storage stable.

Among the various patent applications incorporated by reference in its entirety in the present specification was 09/592,681 (now US Patent No. 6,554,961). In US Patent No. 6,554,961, beginning on column 33, there are comparative examples presented. Of note are comparative examples 2 and 3 found on columns 34 and 35 of which pertain to the practice of biodehalogenation, similar to the practice of biodehalogenation taught in

Bull et al. Referring to the Table 2 on column 35 and Table 3 on column 36 of US Patent No. 6,554,961 in which the biodehalogenated resins were subjected to accelerated aging, it is clear that the initial low levels of CPD contained in the biodehalogenated resins are not maintained. Rather the levels of CPD rise in the samples when exposed to temperature over time. These are clearly not stable resins.

In view of the above results, Applicants respectfully submit that the teachings of Bull et al. do not teach or disclose the production of stable compositions of the present invention, but rather are a useful method of reducing easily available CPD.

Applicants respectfully submit that the rejection of claims 1-13, 19-21 and 34-37 under 35 U.S.C. §103(a) as being obvious over Bull et al. (US 5,470,742) in view of Miller et al. (US 5,171,795) has been traversed since Bull et al. does not teach biocatalytic dehalogenation of a polyamide resin at the higher concentrations claimed by the applicants, and the claims as presently amended recite the enzymatic agents as being selected from the group consisting of an esterase, a lipase, a protease or a combination thereof which clearly distinguishes the enzymatic agents of use in the present invention from the dehalogenase taught in Bull et al. Additionally, applicants respectfully submit that a person of ordinary skill in the art would not be motivated by the teachings of Miller et al. to select a molar ratio of "less than 0.50" when in its broadest range, Miller et al. teaches levels of molar ratios from an order of magnitude below the upper level taught by applicants to a level of three times above the highest level taught by the applicants and in its preferred range teaches levels above applicants' highest level.

In view of the foregoing, applicants respectfully request the withdrawal of the rejection of claims 1-13, 19-21 and 34-37 under 35 U.S.C. §103(a) as being obvious over Bull et al. (US 5,470,742) in view of Miller et al. (US 5,171,795) and allowance of the above mentioned claims.

## **Double Patenting**

The Office Action rejected claims 1-13 and 19-21 under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claim 7-13 and 15-20 of U.S. Patent No. 6,552,961 in view of Bull et al. and Miller et al.

The Office Action states the “[C]laims 7-13 and 15-20 of U.S. Patent No. 6,554,961 encompass a method of treating a polyamine-epihalohydrin resin composition that includes CPD-forming species....” The Office Action goes on to state that “[T]he above claims differ by reciting the starting composition includes a solids content of at least 15 wt% and includes a CPD-forming species final content of less than 100 ppm.”

The Office Action then combines the teachings of Bull et al. and Miller et al. as in the previous rejection of claims 1-13, 19-21 and 34-37 under 35 U.S.C. §103(a), with Bull et al. being provided to teach biocatalytic dehalogenation of a polyamide resin at the higher concentrations and Miller et al. being provided to teach the formation of polyaminopolyamide-epichlorohydrin resins using molar ratios of epihalohydrin to secondary amine groups in the range of 0.05 to 1.5.

Applicants respectfully traverse the rejection of claims 1-13 and 19-21 under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claim 7-13 and 15-20 of U.S. Patent No. 6,552,961 in view of Bull et al. and Miller et al. for the reasons as set forth applicants response to the rejection of claims 1-13, 19-21 and 34-37 under 35 U.S.C. §103(a) hereinabove.

US Patent No 6,554,961 never teaches contacting resins with enzymes at a high solids level, but rather teaches only up to a level of 13.5% solids content. As previously presented, applicants respectfully submit that Bull et al. does not teach biocatalytic dehalogenation of a polyamide resin at the higher concentrations claimed by the applicants and the teachings of Miller et al. could not motivate or provide a suggestion to

a person of ordinary skill in the art to use molar ratios of "less than 0.50" when its teachings in their broadest range are at levels of molar ratios from an order of magnitude below the upper level taught by applicants to a level of three times above the highest level taught by the applicants and in its preferred range teaches levels above applicants' highest level. As such, it would not be obvious to a person having ordinary skill in the art to combine the teachings of U.S. Patent No. 6,552,961 with the teachings of Bull et al. and Miller et al. to arrive at the applicants' invention as claimed in claims 1-13 and 19-21.

As also previously discussed, Bull et al., while a useful process for performing biodehalogenation on resin compositions which are being treated by the process of the present invention, does not result in a polyamine-epihalohydrin resin which is storage stable, as previously discussed in the response to the rejection of claims 1-13, 19-21 and 34-37 under 35 U.S.C. §103(a) hereinabove.

In view of the above, applicants respectfully submit the rejection claims 1-13 and 19-21 under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 7-13 and 15-20 of U.S. Patent No. 6,552,961 in view of Bull et al. and Miller et al. has been traversed. Applicants respectfully request withdrawal of this rejection and allowance of the claims.

If the applicants arguments regarding the rejection of claims 1-13 and 19-21 under the judicially created doctrine of obviousness-type double patenting as being unpatentable over claims 7-13 and 15-20 of U.S. Patent No. 6,552,961 in view of Bull et al. and Miller et al. are deemed to be unpersuasive, applicants agree to submit the necessary terminal disclaimer over US Patent No. 6,554,961 to remove this basis for rejecting the claims once the other bases for objection and/or rejection of the pending claims have been removed.

### **Allowable Subject Matter**

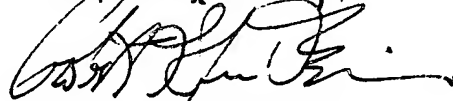
While applicants respectfully agree with the Office Action that claims 26-29, 31-34 and 39 contain allowable subject matter, applicants respectfully disagree that the allowable subject matter contained in the present application is to be limited to a simultaneous treatment of a composition with an enzymatic agent and an additional enzymatic agent of microorganism to dehalogenate residual quantities of organically bound halogen.

### **CONCLUSION**

In view of the foregoing, Applicants respectfully request withdrawal of the above-mentioned rejections of record, and the allowance of all pending claims, and the holding of this application in condition for allowance. If any points remain of issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the below-listed telephone number.

Except as otherwise stated in the above-noted remarks, Applicants notes that each of the amendments have been made to place the claims in better form for U.S. practice, not to distinguish the claims from prior art references, otherwise narrow the scope of the previously pending claims or comply with the other statutory requirements.

Respectfully submitted,



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